

21 CRIM 499

knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JOHNNY PEREZ, a/k/a "Ghost," AARON STARKS, a/k/a "Duke," SEKOU SIMPSON, a/k/a "Tre," FRED JOHNSON, a/k/a "Trinny," DAVON MIAL, a/k/a "Smooth," FRAYVON YOUNG, a/k/a "Harlem," ROBERT MASON, and DONNELL BRUNS, a/k/a "Mac," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JOHNNY PEREZ, a/k/a "Ghost," AARON STARKS, a/k/a "Duke," SEKOU SIMPSON, a/k/a "Tre," FRED JOHNSON, a/k/a "Trinny," DAVON MIAL, a/k/a "Smooth," FRAYVON YOUNG, a/k/a "Harlem," ROBERT MASON, and DONNELL BRUNS, a/k/a "Mac," the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base in the form commonly known as "crack cocaine," in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, JOHNNY PEREZ, a/k/a "Ghost," AARON

STARKS, a/k/a "Duke," SEKOU SIMPSON, a/k/a "Tre," FRED JOHNSON, a/k/a "Trinny," DAVON MIAL, a/k/a "Smooth," FRAYVON YOUNG, a/k/a "Harlem," ROBERT MASON, and DONNELL BRUNS, a/k/a "Mac," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

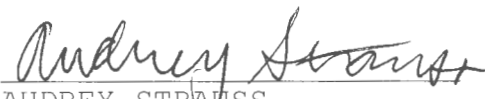
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JOHNNY PEREZ,
a/k/a "Ghost,"
AARON STARKS,
a/k/a "Duke,"
SEKOU SIMPSON,
a/k/a "Tre,"
FRED JOHNSON,
a/k/a "Trinny,"
DAVON MIAL,
a/k/a "Smooth,"
FRAYVON YOUNG,
a/k/a "Harlem,"
ROBERT MASON, and
DONNELL BRUNS,
a/k/a "Mac,"

Defendants.

INDICTMENT

21 Cr.

(21 U.S.C. § 846.)

AUDREY STRAUSS

United States Attorney


Foreperson

True Bill, A. W. ARBON, INDICTMENT

MA. P. HENDERSON

8/12/21 